

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Lawrence W. Luttrell
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In Re:

Minsoo Chu

Case No.: 16-33501

Chapter: 7

Hearing Date: _____

Judge: Hon. Michael B. Kaplan

APPLICATION TO SHORTEN TIME

PLEASE TAKE NOTICE that Minsoo Chu, by the undersigned attorney, Lawrence W. Luttrell, Esq., will apply to the Honorable John K. Sherwood, United States Bankruptcy Court Judge, 50 Walnut Street, Newark, New Jersey 07102, courtroom 3D, for an Order Shortening Time to hear the Motion reinstating the above bankruptcy case.

In support of the application, Debtor will rely upon the Certification of Lawrence W. Luttrell and proposed Order submitted herewith.

LAW OFFICES OF LAWRENCE W. LUTTRELL
Attorney for Debtor, Minsoo Chu

Date: 03/07/2017

By: /s/ Lawrence W. Luttrell
Lawrence W. Luttrell, Esq.

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CERTIFICATION THAT NO BRIEF IS NECESSARY

I hereby certify that no memorandum of law is necessary because no novel issues of law are present and the Application is otherwise supported by citations to authorities herein or is otherwise readily known by the Court.

LAW OFFICES OF LAWRENCE W. LUTTRELL
Attorney for Debtor, Minsoo Chu

Date: 03/07/2017

By: /s/ Lawrence W. Luttrell
Lawrence W. Luttrell, Esq.

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In Re:

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**CERTIFICATION OF LYND SAY M. GANZ IN SUPPORT OF APPLICATION TO
SHORTEN TIME**

I, Lyndsay M. Ganz, hereby certify as follows:

1. I am the attorney for Minsoo Chu, Debtor, and am personally aware of the facts set forth in this certification. I make this certification in support of the Application to shorten the return date to hear the motion to reinstate Debtor's bankruptcy case.
2. After the Debtor's case was converted to a Chapter 13, we only had 14 days to file the missing documents, schedules, and plan.
3. Presently, and at the time of the conversion, the Debtor was in Korea and was having difficulties getting in touch with my office and delivering the documents due to the distance and the time difference.

4. We received the Debtor's paystubs on February 15, 2017, the morning before everything was due to be filed. However, the Court inadvertently dismissed the case that same day.
5. The 341 meeting of creditors date for the previously filed Chapter 13 was scheduled to take place on March 9, 2017.
6. The 341 meeting of creditors date for the Chapter 7 is scheduled to take place on April 17, 2017.
7. Yesterday, I spoke with an attorney with the Chapter 7 Trustee's Office who advised that we should make this motion as soon as possible to avoid having the Chapter 7 dismissed.
8. I respectfully request that the motion be heard on short notice so that the Chapter 7 does not get dismissed and deadlines remain unaffected. The reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006 (c)(2) and the rules listed therein.
9. I certify that the above statements made by me are true. I am aware that if any of the above statements made by me are willfully false I am subject to punishment.

Law Office of Lawrence W. Luttrell, P.C.
Attorneys for Debtor

Date: 3/7/2017

By: /s/ Lawrence W. Luttrell
Lawrence W. Luttrell, Esq.